

unpatentable over Suga in view of Chang for the reasons of record. Claim 38 has also been rejected in view of Suga and Chang. The Examiner also offers rebuttal to some arguments previously submitted. Applicant submits the following arguments for traversing the rejection.

As an initial matter, the Examiner has not rebutted previously submitted arguments that the combination of references is not supportable. Suga relies upon a constant pixel level for the duration of a frame. See Fig. 15 and col. 5, lines 37-48; Figs. 14C-14D. In contrast, Chang relies on cyclic changing display of different patterns. The displays rely on fundamentally different operations.

Further, the references relate to different types of displays. While Suga relates to an R, G, B color display, Chang relates to a monochrome display. Notably, the object of Chang relates to representation of grayscale using the monochrome (e.g. black and white) display using a constantly changing dark pattern to represent pixels in a frame.

The Examiner's proffered reason to use the monochrome display in Chang in the apparatus of Suga is to provide the grayscale without a blinking effect. Page 4, Detailed Action. Since Suga relates to a color display, the use of grayscale is not compatible with the color display. Because Suga pertains to a high quality resolution representation, it is not obvious to degrade the display methodology to a monochrome grayscale. Since the grayscale of Chang is represented by changing page patterns per frame, the amount of grayscale representation is limited, and the resolution is implicitly low.

Applicant would further submit that monochrome approach of Chang would not prevent a blinking effect when applied to a color display. Relatedly, the error diffusion for color error and

RESPONSE UNDER 37 C.F.R. § 1.116
U.S. Appln. No. 09/289,600

the dither matrix for the color data of Suga would not be compatible with distribution of monochrome data. Therefore, in view of the lack of rebuttal by the Examiner on impropriety of the combination, and the additional operational incompatibilities discussed above, the combination is not supportable. Moreover, to the extent Suga relates to a high resolution color display, it would not be compatible with a lower resolution display. Therefore, the references teach away from their combination with each other.

To the extent the Examiner attempts to draw an analogy to the FLCD of Suga and the monochrome LCD of Chang, that analogy does not support the rejection. The FLCD of Suga still relates to an RGB device, not a monochrome device. For this additional reason, the record fails to include a supportable basis to use a monochrome display in Suga. As discussed above, the error diffusion or dither required in Suga would not be compatible with the use of monochrome and would lead to degraded results, thereby undermining a principle object in Suga.

In view of the above, Applicant submits that claims 1-29, 31 and 35-38 are in condition for allowance. Therefore it is respectfully requested that the subject application be passed to issue at the earliest possible time. **The undersigned requests an interview in this matter. The Examiner is requested to contact the undersigned at the local telephone number listed below to discuss scheduling for the interview and any other changes deemed necessary.**

RESPONSE UNDER 37 C.F.R. § 1.116
U.S. Appln. No. 09/289,600

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

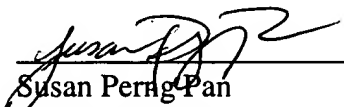
Respectfully submitted,

SUGHRUE MION, PLLC
Telephone: (202) 293-7060
Facsimile: (202) 293-7860

WASHINGTON OFFICE

23373

CUSTOMER NUMBER


Susan Perng Pan
Registration No. 41,239

Date: August 18, 2004